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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

FILED

OCT 23 2019

CLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY A DEPUTY

UNITED STATES OF AMERICA

Plaintiff,

v.

JUAN GERARDO TREVINO-CHAVEZ  
also known as "HUEVO," (1),

Defendant.

CR. NO. **SA 19 CR 0787**  
INDICTMENT

**JKP**

CT 1: 21 U.S.C. 846, 841(a)(1) & (b)(1)(A)  
Conspiracy to Possess a Controlled Substance  
with Intent to Distribute (Marijuana);

CT 2: 21 U.S.C. 952 & 960(a)(1) Conspiracy  
to Import with Intent to Distribute a  
Controlled Substance (Marijuana);

CT 3: 21 U.S.C. 959(a)- Unlawful  
Distribution of Controlled Substances Extra-  
territorial;

CT 4: 21 U.S.C. 861(a)(1) and 846  
Conspiracy to Employ a Person Under 18  
years of Age in Drug Operations; Aiding &  
Abetting

CT 5: 21 U.S.C. 846, 841(a)(1) & (b)(1)(A)  
Conspiracy to Possess a Controlled Substance  
with Intent to Distribute (Cocaine);

CT 6: 21 U.S.C. 952 & 960(a)(1) Conspiracy  
to Import with Intent to Distribute a  
Controlled Substance (Cocaine);

CT 7: 21 U.S.C. 846, 841(a)(1) & (b)(1)(A)  
Conspiracy to Possess a Controlled Substance  
with Intent to Distribute (Methamphetamine);

CT 8: 21 U.S.C. 952 & 960(a)(1) Conspiracy  
to Import with Intent to Distribute a  
Controlled Substance (Methamphetamine);

CT 9: 18 U.S.C. 924(o) Conspiracy to  
Possess Firearms in Furtherance of Drug  
Trafficking;

CT 10: 18 U.S.C. 922(o) and 2 Possession of  
a Machine Gun in Furtherance of Drug  
Trafficking and Attempt; Aiding and Abetting

CT 11: 18 U.S.C. 1956(a)(1)(A)- Laundering  
of Monetary Instruments

THE GRAND JURY CHARGES:

The Defendant, **JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO"**, is the current leader of the Cartel Del Noreste drug cartel, also known as "CDN". CDN is the successor cartel to the LOS ZETAS International Drug Cartel. CDN was established by **JUAN GERARDO TREVINO-CHAVEZ** and other members of his family after Miguel Trevino-Morales, aka as "Zeta 40", and Omar Trevino-Morales, aka "Zeta 42", who were the leaders of the LOS ZETAS Drug cartel, were arrested in Mexico. Prior to this time, **JUAN GERARDO TREVINO-CHAVEZ** had worked for LOS ZETAS as a leader, drug trafficker, enforcer, weapons procurer, and, for a period of time, as a plaza leader. In furtherance of the conspiracy, the Defendant ordered, counseled, commanded, induced, procured, and caused the deaths of multiple people.

**COUNT ONE**  
**[21 U.S.C. §§ 846, 841(a)(1) & (b)(1)(A)]**

Beginning on or about January 1, 2006, and continuing until on or about the date of this indictment, in the Western District of Texas, the Southern District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO"**,

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to possess with intent to distribute and distribute a controlled substance, which offense involved 1000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, contrary to Title 21, United States Code, Section 841(a)(1) and 841 (b)(1)(A)(vii), in violation of Title 21, United States Code, Section 846.

**COUNT TWO**  
**[21 U.S.C. §§ 952(a), 960(a)(1), 960(b)(1)(G) & 963]**

Beginning on or about January 1, 2006, and continuing until the date of this indictment,

in the Western District of Texas, the Southern District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to import a controlled substance, which offense involved 1000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, into the United States from Mexico contrary to Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(G).

**COUNT THREE**

**[21 U.S.C. §§ 959(a), 963, 960(a)(3) and (b)(1)]**

Beginning on or about January 1, 2006, and continuing until the date of this indictment, in the Western District of Texas, the Southern District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to distribute 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled

substance, intending and knowing that said controlled substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a), 963, and 960(a)(3) and (b)(1).

**COUNT FOUR**  
**[21 U.S.C. §§846, 861(a)(1) and (b)]**

Beginning on or about January 1, 2006 and continuing until the date of this indictment, in the Western District of Texas and elsewhere, Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

being a person of at least eighteen (18) years of age, did knowingly and intentionally and unlawfully conspire, combine, confederate, and agree with others known and unknown to the Grand Jury to employ, hire, use, persuade, induce, entice, and coerce a person or persons under eighteen (18) years of age, to violate Title 21, United States Code, Sections 841(a)(1), 846, 952(a), 960(a)(1), 959, and 963, in violation of Title 21, United States Code, Section 846, 861(a)(1) and (b).

**COUNT FIVE**  
**[21 U.S.C. §§ 846, 841(a)(1) & (b)(1)(A)]**

Beginning on or about January 1, 2005, and continuing until the date of this indictment, in the Western District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to possess with intent to distribute and distribute a controlled substance, which offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, contrary to Title 21, United States Code, Section 841(a)(1) and 841 (b)(1)(A)(ii), in violation of Title 21, United

States Code, Section 846.

**COUNT SIX**

**[21 U.S.C. §§ 952(a), 960(a)(1), 960(b)(1)(B) & 963]**

Beginning on or about January 1, 2005, and continuing until the date of this indictment in the Western District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to import a controlled substance, which offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, into the United States from Mexico contrary to Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B).

**COUNT SEVEN**

**[21 U.S.C. §§ 846, 841(a)(1) & (b)(1)(A)]**

Beginning on or about May 1, 2008, and continuing until the date of this indictment, in the Western District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to possess with intent to distribute and distribute a controlled substance, which offense involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, contrary to Title 21, United States Code, Section 841(a)(1) and 841 (b)(1)(A)(viii), in violation of Title 21,

United States Code, Section 846.

**COUNT EIGHT**

**[21 U.S.C. §§ 952(a), 960(a)(1), 960(b)(1)(B) & 963]**

Beginning on or about January 1, 2005, and continuing until the date of this indictment in the Western District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to import a controlled substance, which offense involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, into the United States from Mexico contrary to Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B).

**COUNT NINE**

**[18 U.S.C. §§ 924(c)(1) and (o)]**

Beginning on or about January 1, 2008, and continuing until the date of this indictment, in the Western District of Texas, the Republic of Mexico, and elsewhere, the Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

knowingly combined, conspired, confederated, and agreed with others known and unknown to the Grand Jury to commit offenses against the United States, that is, the **DEFENDANT** conspired to possess firearms in furtherance of the drug trafficking crimes charged in Counts One, Two, Three, Five, Six, Seven, and Eight of this Indictment, re-alleged herein, contrary to Title 18, United States Code, Sections 924(c)(1) and (o).

**COUNT TEN**  
**(18 U.S.C. § 924(c)(1)(B)(ii), 2)**

That beginning on or about March 10, 2016, in the Western District of Texas, the  
Defendant,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

did knowingly possess and aid and abet the possession of a firearm in furtherance of a crime of violence and a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, a Bushmaster, XM15, .223-caliber Machinegun, S/N L353631, a Bushmaster, XM15, .223-caliber Machinegun, S/N L353701, and a Bushmaster, XM15, .223-caliber Machinegun, S/N L528469, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii) and 2.

**COUNT ELEVEN**  
**(18 U.S.C. §§ 1956 (a)(1)(A)(i) & (ii) and 1956(h))**

Beginning on or about January 1, 2010, and continuing through and including the date of this indictment, in the Western District of Texas and elsewhere, the Defendants,

**JUAN GERARDO TREVINO-CHAVEZ aka "HUEVO",**

did knowingly conspire with each other and others known and unknown to the Grand Jury to conduct and to attempt to conduct financial transactions, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, to-wit: drug trafficking violations of Title 21, United States Code, Sections 846, 841(a)(1), 963, 952, 959 and 960(a)(1), with the intent to promote the carrying on of the specified unlawful activity knowing that the

property involved in the financial transaction represented the proceeds of some form of unlawful activity.

**UNITED STATES OF AMERICA'S NOTICE OF DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Controlled Substance Forfeiture Statutes and Violations**

**[Title 21 U.S.C. §§ 841(a)(1), (b), (b)(1)(A)(ii), 841(b)(1)(A)(vii), 846, 861(a)(1) and (b), 952(a), 959 and 959(a), 960(a)(1), 960(a)(1), (a)(3), (b)(1)(B), And (b)(1)(G); 961(a)(1) and (b); 963; subject to forfeiture pursuant to Title 21 U.S.C. §§ 853(a)(1) and (a)(2) and Title 21 U.S.C. § 970]**

As a result of the foregoing criminal violations set forth in Counts One, Two, Three, Four, Six, and Eight, the United States of America gives notice to Defendants of its intent to seek the forfeiture of the below described property upon conviction and pursuant to Fed. R. Crim. P. 32.2, Title 21 U.S.C. §§ 853(a)(1) and (a)(2), and Title 21 U.S.C. § 970, which state the following:

**§ 853 Criminal forfeitures**

**(a) Property subject to criminal forfeiture**

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provisions of State law—

- (1)** any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2)** any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

**§ 970. Criminal forfeitures**

Section 853 of this title, relating to criminal forfeitures, shall apply in every respect to a violation of this subchapter punishable by imprisonment for more than one year.

This Notice of Demand for Forfeiture includes, but is not limited to, the property described in paragraph III below.

**II.**

**Money Laundering Forfeiture Statutes and Violations**

**[Title 18 U.S.C. §§ 1956(a)(1)(A)(i), (ii), and (h); subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1)]**

As a result of the foregoing criminal violations set forth in Count Seven, the United States



of America gives notice to Defendants of its intent to seek the forfeiture of the below listed property upon conviction and pursuant to Title 18 U.S.C. § 982(a)(1), which states the following:

**§ 982. Criminal forfeiture**

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section 1956, 1957, or 1960 of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Notice of Demand for Forfeiture includes, but is not limited to, the property described in paragraph III below.

A TRUE BILL.

  
FOREPERSON OF THE GRAND JURY

JOHN F. BASH  
United States Attorney

  
Assistant United States Attorney